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5/10/10



**Re: Preliminary EW subsurface data memo -- EPA comments**

Ravi Sanga to: Susan McGroddy

05/10/2010 02:44 PM

"Bachman, Brenda M NWS", dan berlin, "Debra Williston

Cc: (debra.williston@kingcounty.gov)", "Debra Williston

((b) (6)", Gary Pascoe, Doug Hotchkiss, "Jeff Stern

Susie -- EPA has reviewed the Preliminary Subsurface Data for the East Waterway. Before EPA can approve the analysis of archived samples, further discussion with the EWG is needed regarding the rationale for the samples chosen and intervals proposed for analysis. In addition, the memo will need to be revised and resubmitted to address the following comments:

**General Comments:**

The memo needs to contain clear references to all associated tables and maps. Currently, it denotes attached Excel files which is insufficient for the reader. Please replace all references to 'attached files' with the appropriate reference.

In several areas of the results section, there are general statements that there are fewer exceedances in the northernmost portion of the waterway and more exceedances in the southernmost portions of the waterway. In the context of this memo, this qualitative statement has little meaning and is not a data result but an interpretation of the current data that does not include historical data. These statements must be removed or a clarification of the intent of the qualitative interpretation provided.

Subsurface sediment sample locations are described inconsistently throughout the memo. Please select a single naming convention (SC##) and apply this consistently throughout memo.

Please maintain consistent units throughout the memo and associated data tables. Revisions are necessary to accomplish this request.

**Specific Comments:**

- 1) Page 1. Second bullet. Please remove the specific reference to MNR under specific objectives. Other remedial options will also depend on the subsurface data not just MNR.
- 2) Preliminary Data (page 2): The rationale of why the first interval was larger than 0-2 ft is not clear. Please clarify why it is significant that native material being present at 2-3 ft, makes a difference regarding the size of intervals for some of the cores. Please add relevance to why the second interval has to represent primarily native material.
- 3) Results for total PCBs (page 2): Map 1b is referenced in the last sentence and appears to be incorrect- please revise with the correct reference. Note that concentrations measured at sampling locations SC28 (9.4 mg/kg) and SC27 (7.6 mg/kg) are elevated to an order of magnitude similar to locations SC23 and SC29. Please correct. Revise 'Coast Guard slip' to the correct slip number (Slip 36) as shown on maps and described in associated documents.
- 4) Results for SMS chemicals other than total PCBs and mercury (pages 2-3): Please explain why SMS exceedances for all chemicals other than PCBs and Hg are shown on maps and discussed in the memo. Either revise to show data results by chemical or describe the purpose of using this category for reporting results.
- 5) The Attachment A legend does not contain information about DMMP SL and ML. Please add.
- 6) Pesticide Analysis results (page 3). Please re-write this section for clarity. Add a statement that locations 11, 19, 39, 54, 57 were analyzed for pesticides, then state clearly which location/depths detected DDT and which exceeded DDT criteria.

**USEPA SF**



**1404650**

7) Results for mercury (page 2): Preliminary data results table appears to contain a value of 1.26 for Hg in SC11 while the text says the value is 3.2. Please clarify which value for Hg is correct. Also, according to the data table Hg was measured at 3.37 at location SC29. Please make sure the location and table are consistent and accurate.

8) Results for SMS chemicals other than total PCBs and mercury (pages 2-3): The results for each chemical exceedance needs to be added to this section as provided in other sections. Currently, this section does not contain a results summary. Please add one. For example, it appears from the data table that there are exceedances of LPAH and HPAH but no information regarding those values is provided in the summary section.

9). TBT results (page 3): The text notes that TBT concentrations are 'low' in the 2-4 ft samples and therefore no additional analyses are proposed. Before EPA can concur with the recommendation provided, more information is needed regarding what can be considered 'low' in order to understand whether it is relevant to the decision to not analyze further.

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Susan McGroddy      Ravi: Here is the memo with the preliminary sub...      04/30/2010 04:29:52 PM

From: Susan McGroddy <SusanM@windwardenv.com>  
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Date: 04/30/2010 04:29 PM  
Subject: Preliminary EW subsurface data

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Ravi,

Here is the memo with the preliminary subsurface sediment data. There is a lot of data! All the data is in the excel file labeled "preliminary results". We have also made graphical depictions of the core (Attachment A) which are quite useful. Leslie has summarized the stratigraphy in Attachment B. Please let me know if you have any questions or need any additional information.

Thanks.

Susie[attachment "subsurface memo 4-30-10.doc" deleted by Ravi Sanga/R10/USEPA/US] [attachment "Attachment A 4-30-2010.xlsx" deleted by Ravi Sanga/R10/USEPA/US] [attachment "Attachment B 4-30-2010.xls" deleted by Ravi Sanga/R10/USEPA/US] [attachment "EW Subsurface Sediment

Preliminary Results 4-30-10.xls" deleted by Ravi Sanga/R10/USEPA/US] [attachment "Preliminary data map folio.pdf" deleted by Ravi Sanga/R10/USEPA/US]